

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

FELIX VALADEZ, LUIS CARRIZOZA, §  
ABIGAIL REYES, AMADA MAN, and §  
TEXAS ENTERTAINMENT §  
ASSOCIATION, INC., LONE STARR §  
MULTI-THEATRES, LTD., d/b/a NEW §  
FINE ARTS WEST, XTC CABARET, INC., §  
d/b/a XTC CABARET AUSTIN, and RCI §  
DINING SERVICES (ROUND ROCK), §  
INC., d/b/a RICKS CABARET, §  
*Plaintiffs* §  
v. §  
§  
KEN PAXTON, in his official capacity as §  
Attorney General of the State of Texas, §  
and ED SERNA, in his official capacity §  
as Executive Director of the Texas §  
Workforce Commission, §  
*Defendants.* §

CIVIL ACTION NO. 1:21-CV-519

**DEFENDANTS' NOTICE OF DISCLOSURE OF EXPERT TESTIMONY**

Pursuant to the Court's Scheduling Order and the agreement of the parties, Ken Paxton, in his official capacity as Attorney General of Texas, and Ed Serna, in his official capacity as Executive Director of the Texas Workforce Commission, (collectively, "Defendants"), file their Notice of Disclosure of Expert Testimony confirming the service of Defendant's Rule 26(a)(2) Disclosure of Expert Testimony.

Respectfully submitted.

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Deputy Attorney General for Civil Litigation

CHRISTOPHER D. HILTON  
Chief, General Litigation Division

*/s/ Ryan G. Kercher*  
RYAN G. KERCHER  
Texas Bar No. 24060998  
Assistant Attorney General  
JOHN RAMSEY  
Texas Bar No. 24051227  
Assistant Attorney General  
Office of the Attorney General  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Phone: 512-463-2120  
Fax: 512-320-0667  
[Ryan.Kercher@oag.texas.gov](mailto:Ryan.Kercher@oag.texas.gov)  
[John.Ramsey@oag.texas.gov](mailto:John.Ramsey@oag.texas.gov)  
*Counsel for Defendants*

#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served upon Plaintiff's counsel via electronic mail on September 22, 2022.

*/s/ Ryan G. Kercher*  
RYAN G. KERCHER